



**NORTHWEST
ENVIROSERVICE**
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RCRA Compliance Section

December 29, 1994

Mr. Kevin Schanilec
RCRA Compliance Section
United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, WA 98101

SUBJ: Northwest EnviroService, Inc. Closure Plan

Dear Mr. Schanilec:

This letter and attachments are being submitted in response to your letter dated November 29, 1994 regarding Northwest EnviroService, Inc.'s (NWES') "Closure Plan, Closure of Freuhauf Pit, Large Pit, Sumps No. 2 and 4" (Closure Plan) submitted in July 1994.

Attached please find a revised Closure Plan and related attachments for your review and comment. We look forward to your reply regarding this submittal.

Sincerely,

J. Stephan Banchemo, Jr.
President

Attachments

cc: Sally Safioles, Ecology NWRO
Jerry Bartlett, NWES

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Attachment 1

Response to letter to Mr. John S. Banchero, Jr., NWES, from Mr. Kevin Schanilec, EPA Region 10, "detailed written statement of reasons for the disapproval", dated November 29, 1994.

Attachment A - EPA comments:

1. A reference has been added to the closure plan noting that any sampling of groundwater will be conducted under the RFI Workplan.
2. The March 1993 report of integrity tests cited in the closure plan has been previously submitted to EPA. It has therefore not been appended to the revised closure plan.
3. As suggested, the closure plan has been prepared in document control format with the revision number and date on each page.
4. As suggested, additional information on QA management of the project has been added to the closure plan including the name of the NWES Project Manager/QA Manager. The analysis of samples will be conducted by an independent laboratory yet to be selected. Data validation/assessment will be performed by CH2M HILL. The NWES Project Manager has overall responsibility for the quality of sampling and analysis data at the site.
5. The four units covered in the closure plan are referred to as three tanks and one alleged surface impoundment. The statement suggested by EPA in Attachment A regarding the allegations in the Complaint has been incorporated into the revised closure plan.
6. Section 1.1, Closure Activities, has been amended as suggested.
7. Section 1.1, has been corrected as noted in the response to item 5.
8. As requested, the plan now states that the unites are being closed in accordance with 40 CFR Part 265 subparts G, J and K. Dates of when the sumps were placed into service have added as requested.
9. For analyses to be conducted on samples collected from the Oil Water Separator and the Primary Sedimentation Tank, NWES has added the constituents from used oil as contained in 40 CFR Part 279, Standards for the Management of Used Oil. NWES believes that the suite of volatile organics and total metals comprises a realistic set of constituents to be analyzed for based on the operational history of the units in the closure plan.
10. The number of samples to be collected as presented in the closure plan was taken directly from the February 1994 letter to Mr. Charles Blumenfeld, Bogle & Gates, legal counsel to NWES, from Mr. Ted Yackulic, EPA Region 10. A reference has been added to the closure plan noting that any sampling of groundwater will be conducted under the RFI

Workplan. Currently available facility sampling and analytical information does not indicate soil or groundwater contamination is present in the facility subsurface. This facility information is presented in the Draft RFI Workplan, Section 2, Current Conditions. The Draft RFI Workplan was submitted to EPA Region 10 on June 7, 1994. No comments have been received to date on that workplan.

Additionally, groundwater samples were collected from the four onsite monitoring wells in April 1994. The samples were analyzed for the following Appendix IX parameters:

- TCL Volatiles (SW-846 8240)
- TCL Semivolatiles (SW-846 8270)
- TCL Pesticides/PCBs (SW-846 8080)
- TAL Metals and Cyanide (SW-846 6010/7000)
- Sulfide (EPA 376.2)
- Herbicides (SW-846 8150 modified)
- Organophosphorus pesticides (SW-846 8141 modified)
- TPH (WTPH 418.1 modified)
- Sulfate, Nitrate, Chloride (EPA 300.0)
- Alkalinity, Carbonate, Bicarbonate (SM 2320B)
- Total Kjeldahl Nitrogen (EPA 351.2)
- Total Dissolved Solids (EPA 160.1)
- Total Organic Carbon (EPA 415.1)
- Total and ortho phosphorus (EPA 365.1)

Based on the laboratory reports, manganese (570 - 3400 ug/l) was detected in all four wells above the MTCA Method B groundwater cleanup level of 80 ug/l. One monitoring well (MW-3) had two detections above MTCA Method B groundwater cleanup levels: trichloroethylene at 32 ug/l (MTCA Method B cleanup level 3.98 ug/l) and tetrachloroethylene at 14 ug/l (MTCA Method B cleanup level 0.85 ug/l). Both these values were reported by the laboratory with a data qualifier flag "J" which means that the numerical value is an estimated quantity. All other constituents in all four wells analyzed for were below their respective Method B groundwater cleanup levels.

Based on this information, a reduced set of analytical parameters as currently included in the revised closure plan, would be adequate for the units undergoing closure.

The closure plan has been revised to include a task to map the cracks in the concrete, if any, in each unit.

11. Section 4.2, Specific Performance Standards, has been modified to state that decontamination will follow the Ecology "Guidance for Clean Closure of Dangerous Waste Facilities", dated August 1994. The guidance refers to 40 CFR Part 268.45 for acceptable decontamination methods and performance standards.

Decontamination washwater will be analyzed for the parameters required in the facility METRO discharge permit prior to discharge to METRO.

12. No rinsate samples will be collected in the revised closure plan.
13. Refer to response to item 9.
14. Based on the NWES facility location and the area hydrology, groundwater beneath the facility is assumed to flow to the northwest towards the Duwamish River. There are no drinking water wells within a 1 mile radius of the NWES facility. This facility information is presented in the NWES Part B Permit Application submitted to EPA Region 10 on May 23, 1994. Further information on groundwater at the NWES facility is presented in the Draft RFI Workplan, dated June 1994.

Given the industrial uses of the areas surrounding the NWES facility and that this closure plan is being prepared in resolution to an alleged Complaint, it is appropriate to use MTCA Method C as the performance standard for these units. It is also important to note that Sumps No. 2 and No. 4 will also be closed under the Interim Status Closure Plan which will adhere to the MTCA Method B cleanup level clean closure guidelines adopted by the Dangerous Waste Regulations.

Refer also to response to item 10.

15. The closure plan has been modified to include a task to map the cracks in the units.
16. Section 5.4, Performance Standard Verification, has been modified as noted.
17. Refer to response to item 11 and 12.
18. The table in Section 5.4 has been numbered as noted. Refer to response to item 9 for discussion of constituents to be analyzed.
19. The noted Quality Assurance items have been added to the sampling and analysis plan.
20. The closure plan now states that a laboratory approved for RCRA (solid waste) analyses will perform the analyses. The laboratory documents noted for NWES review are typically considered by the state agency prior to granting certification to the laboratory as established by EPA. Therefore it seems that NWES would be duplicating an agency/EPA program to "document and approve" the noted documents.
21. EPA data validation references have been incorporated into the closure plan. Data validation/assessment will be performed by CH2M HILL.
22. Closure plan has been modified as noted.
23. Section 7.0, Post Closure Plan has been modified per 40 CFR 265 requirements.
24. Refer to response to items 11 and 12.

25. Refer to response to items 11 and 12.
26. Closure plan has been modified as noted.
27. Refer to response to item 10.
28. Refer to response to item 9.
29. Data Quality Objectives (DQOs) have been added to the closure plan as requested.
30. The plan has been revised to clarify that only discrete soil samples will be collected.
31. Refer to response to item 9.
32. Refer to response to item 9, 11 and 12.

Attachment B - Ecology comments:

General Comments -

1. Not applicable to NWES response per cover letter from EPA.
2. In the revised closure plan, specific units have been clearly identified as a tank or alleged surface impoundment.
3. (comment number 3 - missing from letter)
4. Descriptions and figures included where available for each unit.
5. A cost estimate has been provided in the revised closure plan.

Specific Comments -

1. Closure plan modified as noted.
2. A reference has been added to the closure plan noting that any sampling of groundwater will be conducted under the RFI Workplan.
3. NWES contact person added to the plan as requested.
4. Plan now notes that Sumps No. 2 and No. 4 will be placed back in service for nonhazardous use after closure.
5. Sludge from the OWS will be sent to a hazardous waste landfill.
6. Sludge from the PST will be sent to a hazardous waste landfill.

7. A volume of Sump No. 2 was added to the revised closure plan.
8. Refer to response to items 11 and 12 above.
9. Change made as noted.
10. Refer to response to item 14 above.
11. Change made as noted.
12. Not applicable - footnote noted that vinyl chloride was not detected above a regulatory level.
13. Mapping of cracks in the units will be completed and is included in the revised closure plan.
14. Figure 5-1 has been added to the revised closure plan.
15. Section 5.3, Decontamination of Units, has been modified to reference 40 CFR Part 268.45.
16. Refer to response to item 10 above.
17. Typographical error corrected as noted.
18. Sumps No. 2 and No. 4 will be placed back into service for nonhazardous use.
19. Section 6.0, Closure Certification, reflects 40 CFR Part 265 timeframes.

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